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### **REMARKS/ARGUMENTS**

Prior to this Amendment, claims 1-9 and 11-21 were pending in the application.

Claim 1 is amended to include the limitations of originally filed claim 6 (which is canceled) and independent claim 19 is amended to include the limitations of originally filed claim 19 (which is canceled). These two claim amendments place the claims in condition for allowance or in better condition for use on appeal and do not raise new issues as the limitations were previously presented to the Examiner (i.e., do not require further searching or place an undue burden on the Examiner).

Claims 1-5, 7-9, 11-19, and 21 remain in the application for consideration by the Examiner.

The February 23, 2005 Office Action withdrew the rejection of claims 1-6, 9, 11, and 14-18 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,026,474 ("Carter"). The Office Action also withdrew the rejection of claims 7, 8, 10, 12, 13, and 19-21 under 35 U.S.C. §103(a) as being unpatentable over Carter in view of U.S. Patent No. 6,026,474 ("Beurket").

### **Rejections Under 35 U.S.C. §103**

In the Office Action, claims 1-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Carter in view of U.S. Patent No. 6,026,474 ("Nye"). The rejection of pending claims 1-5, 7-9, 11-19, and 21 is traversed based on the following remarks.

As noted in the prior response and as discussed in the Background of the application, the invention is addressing the need for applications to use environmental variables or properties and other data that is often "localized" to a particular user and/or to a particular geographic location and language. Existing techniques for retrieving localized data typically require the "application to be aware of the location and/or identification of localization information" and often require that an application be shutdown or restarted to update to new values. In this regard, an example of how the present invention addresses these and other problems associated with prior systems is provided in the paragraph beginning at line 24, page 34. In this example, it is seen that a localized application value such as a piece of text for a web page may have a

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different value depending upon which language is associated with a user and where that user is physically located when accessing the application. The invention provides an effective technique for accessing such data throughout a network regardless of location while making a user's experience with an application consistent and personalized to the user (e.g., an application will appear and act typically will behave similarly in diverse locations used to access a network/application).

Turning to the claims, claim 1 is directed to a computer system for providing localized data to computing devices. The system includes a client device with a local memory for storing localized application values used by an application running on the client device and an administrative interface. The system further includes an application value repository that is linked to the client device via a communications network and that stores localized application values. The administrative interface is operable to receive a request from the application for application values and to respond "by selectively retrieving the localized application values corresponding to the request from the local memory and the application value repository, wherein the localized application values are selected based upon a geographical area and a language selection included in the request, and wherein the localized application values stored in the application value repository include property values."

Further, as discussed in the prior response, Carter provides no teaching on the use of localized application values or how such "localized" data should be retrieved for an application. More specifically, the Office Action cites Carter at "web cache, col. 2, lines 38-55; ab; fig. 7" for teaching storing localized application values used by the application. However, Carter generally teaches a system in which cache of local or client devices can be shared to create a much larger cache than would be available if each device could only use its own local memory or cache and in some cases, variables stored in such caches are shared across a network (see, for example, Carter at col. 27, lines 38-39, "The distribution file system 60 described above allows user 400 and user 420 to share their Internet browser caches" which is useful for sharing data/variables among users, too). Carter's web cache does allow sharing of variables

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and local memory but fails to discuss "localized application values" being stored locally at a client device. In other words, "localized" does not mean simply data that is locally stored (which is made clearer in further limitations discussed below).

More significantly, Carter fails to teach that an administrative interface is provided on the client device that responds to a request for application data by selectively retrieving localized application values either from the local memory or from an application value repository. The selection is done based on geographical area and language selection in the request by the administrative interface.

The Office Action points to Figure 9 for the repository but this reference is to a directory page of the Carter shared memory and does not teach storage of localized application values in a repository linked to client devices over a network. Further, the Office Action cites Carter at col. 20, lines 52-59 and at "ab; col. 5, lines 48 to col. 6, lines 10; col. 14, lines 21-51" for teaching selective retrieval of the localized application values based on the geographic area and language selection in the request. In col. 20, Carter discusses performing a memory operation which may be used to obtain data from the network shared web cache or the like, but Carter fails to teach retrieving localized application values based on geographic area and language. In cols. 5, 6, and 14, Carter discusses accessing a file system distributed across devices in a network but does not teach selectively retrieving localized application values from local memory or a repository or doing such retrieval based on a geographic area or language selection in the request. Hence, Carter does not teach or suggest each element of claim 1, and claim 1 is allowable over Carter.

The Response to Arguments asserts that Carter does teach use of "localized application values" with its teaching in the Abstract and Figures 2, 7, and 8 of "client-side web caching where browser applications have been stored." However, as noted above, Carter's web cache allows sharing of variables and local memory but fails to discuss "localized application values" being stored locally at a client device. Again, "localized" does not mean simply data that is locally stored. Nowhere in the either of the last two Office Actions has the Examiner addressed the need to find a reference

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that teaches "localized" application variables, which in effect impermissibly reads this limitation out of the claims.

The Examiner then states in the Response to Arguments that claim 1 does not call for the localized application values to be stored at the client device. Applicants disagree as claim 1 calls for a client device comprising "a local memory for storing localized application values used by the application." Further, Applicants disagree that the administrative interface is "inherent" in Carter because any interfaces shown in Carter do not assist applications in a client device with retrieving localized application values as asserted by the Examiner. Carter's teaching in the Abstract and Figures 2, 7, and 8 do not show an application using localized application values and clearly does not show the client device configured with the administrative interface of claim 1.

Further, Carter clearly does not teach such selection should be based on a geographical area and a language selection in a request for data or that the localized application values stored in the application value repository include property values. The Office Action agrees with this interpretation of Carter and cites Nye for providing these additional limitations missing from Carter. However, Nye fails to overcome the deficiencies of Nye. Nye is directed to an e-commerce method in which searching for retail items may be limited to particular geographic regions (see, for example, the portions of Nye cited by the Office Action at paragraphs [0029] and [0251]).

However, such teaching does not teach or suggest "retrieving the localized application values corresponding to the request from the local memory and the application repository, wherein the localized application values are selected based upon a geographical area" as called for in claim 1. Instead, Nye teaches that computers are bound to geographic regions and sharing of documents and the like is done based on the location of the computer (see, the Nye Abstract). There is no teaching in Nye that an application in one of those geographic regions runs an application with differing application values from an application in another one of the geographic regions because the values are localized to suit the geographic regions. For this reason, Carter and Nye fail to teach the system of claim 1.

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Similarly, Nye fails to teach "wherein the localized application values are selected based upon ... a language selection included in the request." As discussed above, Carter fails to explicitly teach use of localized application values by applications and how such values are to be provided to the applications. The Office Action cites Nye at para. [0227] for teaching this limitation. However, Nye at this citation is teaching that language can be a barrier in searching on the Internet and instead of using language a search can be better restricted by geography. Clearly, there is no suggestion in this paragraph (or elsewhere) that an application provides a request with a language selection that is used by an administrative interface to selectively retrieve localized application values from local memory and an application value repository. Hence, Nye fails to overcome the deficiencies of Carter, and the rejection of claim 1 is improper based on the combined teachings of Carter and Nye.

Yet further, claim 1 as amended calls for the localized application values to include property values. Carter is cited at col. 22, lines 10-19 and col. 23, lines 52-57 for providing this teaching. At col. 22, lines 10-29, Carter is discussing operation of a flow scheduler 272" and provides no teaching of including property values for use by an application in localized application values. At col. 23, lines 52-57, Carter is describing a directory manager but provides no suggestion of the claim limitation. For this additional reason, claim 1 is not shown or suggested by Carter, and Nye fails to overcome this additional deficiency of Carter.

Claims 2-5 and 8 depend from claim 1 and are believed allowable as depending from allowable base claim. Further, claim 2 calls for an update mechanism in the client device that monitors the localized application values "at the application value repository and to update the localized application values in the local memory." The Office Action cites Carter at col. 9, lines 15-28 for teaching this limitation, but at this citation, Carter is directory updates and provides no discussion of localized application values and monitoring a repository for modifications and when detected, updating locally stored localized application values. Claims 4 and 5 are directed to embodiments in which the localized application values may be included in an XML file and the repository may be

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used to store a stylesheet that combines with the XML file to produce a localized stylesheet. The Office Action cites Carter at col. 26, line 60 to col. 27, line 13, but Carter at this point is simply stating that stored files may be HTML files but provides no suggestion that localized application values may be stored in an XML file or that a stylesheet stored at a repository can be used to produce a localized stylesheet. For these additional reasons, claims 2, 4, and 5 are believed allowable over Carter and Nye.

Independent claim 9 is directed to a method with limitations similar to that of claim 1 and is believed allowable at least for the reasons for allowing claim 1. Further, claim 9 calls for the request from the application to include "an application name, a geographical area code, a language code, and at least one element name which are used in the retrieving steps to provide localized application values matching the geographical area code and the language code." In rejecting claim 9, the Office Action simply refers to claim 1 but provides no teaching of codes for a geographical area and a language in combination with an element name to assist in retrieving localized application values. Because this limitation is not provided in claim 1, a prima facie case of obviousness has not been stated for claim 9 as all limitations have not been shown to be present in the cited references. For this additional reason, claim 9 is believed allowable over Carter and Nye.

Claims 11-17 depend from claim 9 and are believed allowable at least for the reasons for allowing claim 9. Further, claim 13 calls for populating to include obtaining a geographical hierarchy (see, for example, Figure 3) and populating a data structure for localized application values by beginning at a supplied geographical area node and progressing upward in the hierarchy. As stated in the prior response, the Office Action merely states that the limitations of claim 13 were addressed in earlier analysis of the Office Action but claims 13 is the first claim to specifically call for data structure populating using a geographical hierarchy. Applicant has reviewed Carter and Nye but could find no mention of such populating or the use of a geographical hierarchy to

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create a data structure for localized application values. Hence, claim 13 is believed allowable for this additional reason.

Independent claim 18 is directed to an interface for providing localized data to an application. Claim 18 includes limitations similar to those of claim 1 and 9, and the reasons provided for allowing claims 1 and 9 are believed equally applicable to claim 18.

Independent claim 19 is directed to a computer readable medium containing a data structure according to the Applicants' invention. The data structure includes limitations similar to that of claim 1 and is believed allowable for the reasons for allowing claim 1. Further, claim 19 includes limitations similar to that of claim 13, and the reasons for allowing claim 13 over Carter and Nye are believed applicable to claim 19. Applicants' specifically request that Examiner provide specific citations for teaching "wherein each of the element values comprises a localized value for a node in a tree structure in which each of the nodes corresponds to a combination of a geographical area, a supported language, and a staged or released value" or withdraw the rejection of claim 18.. Claim 21 depends from claim 20 and adds the concept of user roles and access "based on the staged or released value." Again, no citation is provided in the Office Action for this concept of the invention, and hence, claim 21 is allowable because a *prima facie* case of obviousness was not presented in the Office Action.

Claims 7 and 8 depend from claim 1 and are believed allowable as depending from an allowable base claim. The Office Action cites Beurket (U.S. Pat. No. 6,360,273), but as discussed in the last response, Beurket fails to overcome the deficiencies of Carter discussed previously with reference to claim 1. Particularly, Beurket fails to teach selective retrieval of localized application values based on geographic and language information included in an application data request. The Response to Argument fails to address Applicants' assertion regarding Beurket and claim 1.

Additionally, claim 7 calls for the localized application values to include user roles which can vary based on geographical location and the retrieval by the administrative

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interface can vary based on the user role. The Office Action cites Beurket for teaching this limitation, but Applicant could find no discussion in Beurket of a "user role" or that such a role may vary based on geographical location.

### Conclusions

In view of all of the above, it is requested that a timely Notice of Allowance be issued in this case.

No fee is believed due for this submittal. However, any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,

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